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Philips Electronics North America Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi, Ltd.,  
et al., No. 13-cv-01173;*

*Sharp Electronics Corp. v. Koninklijke Philips  
Elecs., N.V., No. 13-cv-2776 SC.*

Case No. 07-5944 SC

MDL No. 1917

**DECLARATION OF TIFFANY B.  
GELOTT IN SUPPORT OF  
KONINKLIJKE PHILIPS N.V.'S AND  
PHILIPS ELECTRONICS NORTH  
AMERICA CORPORATION'S  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(d)**

Date: None set  
Time: 10:00 a.m.  
Place: Courtroom No. 1

Hon. Samuel Conti

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants  
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the  
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to  
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Philips  
6 Defendants’ Administrative Motion to File Documents under Seal Pursuant to the Civil Local  
7 Rules 7-11 and 79-5(d).

8 2. I have personal knowledge of the facts set forth herein and, if called upon, could  
9 and would competently testify thereto under oath.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306)  
11 (the “Stipulated Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the  
13 Philips Defendants seek to file the following documents or portions thereof under seal:

- 14 a. Portions of Joint Defense Motion In Limine #15: Motion to Exclude  
15 Evidence Related to a Violation of the Antitrust Laws Under a Rule of  
16 Reason Analysis (the “Motion”); and  
17 b. Exhibit 1 to Declaration of Tiffany B. Gelott in Support of the Motion  
18 (“Gelott Declaration”), interrogatory responses from Sharp Electronics  
19 Corporation and Sharp Electronics Manufacturing Company of America,  
20 Inc.’s First Supplemental Responses and Objections to Defendants Hitachi  
21 Electronic Devices (USA), Inc. and Samsung SDI America, Inc.’s First Set  
22 of Interrogatories, dated February 26, 2014.

23 5. The documents or portions of the documents submitted under seal contain either (a)  
24 material designated by Sharp pursuant to the Stipulated Protective Order (Dkt. 306, June 18,  
25 2008) as “Confidential” or (b) an analysis of, references to, or information taken directly from  
26 material designated by Sharp pursuant to the Stipulated Protective Order as “Confidential” or  
27 “Highly Confidential.”  
28

Executed on February 13, 2015 in Washington, DC.

Tiffany B. Gelott